> JUL 17 2020 JULIA C. DUDLEY, CLERK BY: s/ H. MCDONALD DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF VIRGINIA DANVILLE DIVISION

KAREN DELORES TURNER,)
Plaintiff,)
V _{ij}) 4:20CV00041) Civil Action No.: *XXXXXXXXX
WAL-MART STORES EAST, LP, and)
WALMART, INC., Defendants.)))

JOINT NOTICE OF REMOVAL

COME NOW the defendants, Wal-Mart Stores East, LP, and Walmart, Inc. (collectively referred to herein as "Wal-Mart"), by counsel, pursuant to 28 U.S.C. §§ 1441 and 1446, and file this Joint Notice of Removal to remove this action to this Court from the Circuit Court for the City of Martinsville, Virginia. In support of this Joint Notice, the defendants state as follows:

- 1. Upon information and belief, plaintiff is, and was at all times relevant hereto, a resident, citizen, and domiciliary of the Commonwealth of Virginia.
- 2. At the time this action commenced, and at the time of removal, Walmart Inc., was a Delaware corporation with its principal place of business in Bentonville, Arkansas.
- 3. At the time this action commenced, and at the time of removal, Wal-Mart Stores East, LP, was a Delaware limited partnership with its principal place of business in Bentonville, Arkansas. The partners of Wal-Mart Stores East, LP, are WSE Management, LLC, which is a Delaware limited liability company, with its principal place of business in Bentonville, Arkansas, and WSE Investment, LLC, which is a Delaware limited liability company, with its principal place of business in Bentonville, Arkansas. The sole member of both WSE Management, LLC and WSE Investment,

LLC, is Wal-Mart Stores East, Inc., which is an Arkansas corporation with its principal place of

business in Bentonville, Arkansas.

4. The plaintiff has filed a Complaint against the defendants in the Circuit Court for the

City of Martinsville, Virginia. A copy of the plaintiff's Complaint and the defendants' Responsive

Pleading are attached hereto as Exhibit A, pursuant to 28 U.S.C. § 1446.

5. This Joint Notice is filed within thirty (30) days after service upon the defendants and

is filed not more than one (1) year after the commencement of this action, pursuant to 28 U.S.C. §

1446(b).

6. This civil action is one over which this Court has original jurisdiction pursuant to 28

U.S.C. § 1332, and the amount in controversy alleged in the Complaint exceeds Seventy-Five

Thousand Dollars (\$75,000.00) exclusive of interest and costs, and the action is between citizens of

different states.

7. The defendants have given notice of the filing of the Joint Notice of Removal to

counsel for the plaintiff and have filed a copy with the Clerk of the Circuit Court for the City of

Martinsville, Virginia.

8. The defendants are represented by the same counsel and all join in the removal of this

case to this Court.

WHEREFORE, the defendants, by counsel, hereby give notice to this Court that this action is

removed to this Court from the Circuit Court for the City of Martinsville, Virginia.

WAL-MART STORES EAST, LP, and

WALMART, INC.

/s/ Victor S. Skaff, III

Of Counsel

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Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of July, 2020, a copy of the foregoing Joint Notice of Removal was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

W. Barry Montgomery, Esq. (VSB No. 43042) KPM Law 901 Moorefield Park Drive, Suite 200 Richmond, Virginia 23236 Telephone: (804) 320-6300

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Counsel for Plaintiff

/s/ Victor S. Skaff, III
Of Counsel